

September 12, 1997

EA 97-408

Mr. M. L. Marchi
Manager, Nuclear Business Group
Wisconsin Public Service Corporation
Post Office Box 19002
Green Bay, WI 54307-9002

SUBJECT: NRC INSPECTION REPORT 50-305/97011(DRS) AND NOTICE OF VIOLATION

Dear Mr. Marchi:

On August 8, 1997, the NRC completed an inspection of your implementation of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (the maintenance rule) at the Kewaunee Nuclear Power Plant. The enclosed report presents the results of that inspection.

Your program for implementing the requirements of the maintenance rule followed the guidance provided in NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," dated April 1996, which was endorsed in Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," dated March 1997. Based on the recent program changes resulting from concerns identified during a quality program audit, your program generally met the requirements of the maintenance rule. However, two violations associated with performance criteria were identified. The first concerned reliability performance criteria for high safety significant systems that were inconsistent with the assumptions in your probabilistic risk assessment. The second concerned establishing inappropriate performance criteria of "run to failure" for the containment hydrogen monitoring and mitigating functions.

The violations are cited in the enclosed Notice of Violation (Notice), and the circumstances surrounding the violations are described in the enclosed report. Although 10 CFR 2.201 requires you to submit a written statement of explanation, we note that the first violation has been corrected and those actions were reviewed during this inspection. Therefore, no response with respect to this violation is required. Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response to the second violation. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

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M. L. Marchi

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, the enclosure, and your response to this letter will be placed in the NRC Public Document Room.

Sincerely,

/s/ J. A. Grobe

John A. Grobe, Acting Director
Division of Reactor Safety

Docket No. 50-305
License No. DPR-43

Enclosures: 1. Notice of Violation
2. Inspection Report 50-305/97011(DRS)

cc w/encs: C. R. Steinhardt, Senior
Vice President - Nuclear Power
C. A. Schrock, Manager, Kewaunee Plant
Virgil Kanable, Chief, Boiler Section
Cheryl L. Parrino, Chairman,
Wisconsin Public Service Commission
State Liaison Officer

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